

EXHIBIT "A"

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12 Admitted Pro Hac Vice

13 Attorneys for Defendants

14 Flynt Media Corporation; Jimmy Flynt, II; Dustin Flynt

15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA

17 LARRY C. FLYNT; LFP VIDEO
18 GROUP, LLC; and LFP IP, LLC,

19 Plaintiffs,

20 v.

21 FLYNT MEDIA CORPORATION, a
22 Delaware Corporation; JIMMY
23 FLYNT, II; DUSTIN FLYNT; and
DOES 1 through 10, inclusive,

24 Defendants.

Case No. CV09-00048 AHM (RZx)

**DEFENDANTS' AMENDED
WITNESS LIST**

Pre-trial Conference: Nov. 23, 2009
Trial: Dec. 8, 2009

25 Defendants Flynt Media Corporation, Jimmy Flynt II, and Dustin Flynt
26 hereby amend their previously submitted trial witness list in the above-captioned
27 matter with the addition of Jimmy Flynt, Sr.
28

	Witness Name	Contact Information
1. 2. 3. 4.	1. Larry C. Flynt	Mr. Larrv C. Flynt c/o Richard W. Labowe, Esq. 1631 West Beverly Boulevard, Second Floor Los Angeles, California 90026-5746 213-250-9800
5. 6. 7.	2. Michael Klein	8484 Wilshire Blvd. Beverly Hills, CA 90211 Telephone: 323-651-5400
8. 9.	3. Jeff Thill	8484 Wilshire Blvd. Beverly Hills, CA 90211 Telephone: 323-651-5400
10. 11.	4. Theresa Flynt	8484 Wilshire Blvd. Beverly Hills, CA 90211 Telephone: 323-651-5400
12. 13.	5. Brad Eels	8484 Wilshire Blvd. Beverly Hills, CA 90211 Telephone: 323-651-5400
14. 15. 16.	6. Dustin Flynt	c/o James D. Boyle, Esq. Santoro, Driggs, Walch, Kearney, Hollev & Thompson 400 South Fourth Street, Third Floor Las Vegas, Nevada 89101 702-791-0308
17. 18. 19. 20.	7. Jimmy Flynt, II	c/o James D. Boyle, Esq. Santoro, Driggs, Walch, Kearney, Hollev & Thompson 400 South Fourth Street, Third Floor Las Vegas, Nevada 89101 702-791-0308
21. 22. 23.	8. Mark Mauceri	c/o Daniel C. DeCarlo, Esq. Lewis Brisbois Bisgaard & Smith LLP 221 North Figueroa Street, Suite 1200 Los Angeles, Ca 90012
24. 25. 26. 27.	9. Jimmy Flynt, Sr.	c/o H. Louis Sirkin, Esq. Sirkin, Pinales & Schwartz 920 Fourth & Race Tower 105 West Fourth Street Cincinnati, Ohio 45202 513-721-1311

1 DATED: November 18, 2009

2 LEWIS BRISBOIS BISGAARD & SMITH LLP

3
4 By: /S/ MINA L. HAMILTON
5 Attorneys for Defendants
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EXHIBIT “B”

Mina Hamilton - RE: Flynt v. Flynt- Depo of Jimmy Flynt Sr.

From: Dan DeCarlo
To: Jonathan W. Brown; lou sirkin; mark hoffman; richard labowe
Date: 10/9/2009 11:58 AM
Subject: RE: Flynt v. Flynt- Depo of Jimmy Flynt Sr.
CC: Daniel Lewis; Mina Hamilton

Jonathan:

Please identify the documents by Trial Exhibit number rather than bate number, that would be easier to follow.

What makes you think we were not going to ask him questions at the deposition in April? I am unaware of any rule that says the non-noticing party can't ask questions at a deposition. Since his deposition is going forward, yes, we do intend to ask him questions. Also, since his deposition is going forward, we intend to add him to our witness list for trial. Certainly there will be no prejudice to you as you are the ones insisting that his deposition be taken. Do you object to our asking questions at the deposition and adding him to our witness list?

Are you going to prepare a stipulation for Judge Matz or are you planning on going forward without getting Judge Matz' permission?

Regards.

Daniel C. DeCarlo
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decarlo@lbbslaw.com (email)

>>>

From: "Jonathan W. Brown" <jbrown@lglaw.com>
To: "Dan DeCarlo" <DECARLO@lbbslaw.com>, "richard labowe" <Llhlaw1631@aol.com>, "mark hoffman" <MshLLH@aol.com>, "lou sirkin" <lsirkin@sirkinpinales.com>
CC: "Daniel Lewis" <drlewis@lbbslaw.com>, "Mina Hamilton" <HAMILTON@lbbslaw.com>
Date: 10/9/2009 11:46 AM
Subject: RE: Flynt v. Flynt- Depo of Jimmy Flynt Sr.
Dan:

We are pleased to hear that you worked out the scheduling issues on your end. We intend to show Mr. Flynt only a limited set of documents, and will provide your with the applicable bates numbers in advance. I'm puzzled by your statement that you intend to show documents to Mr. Flynt. It isn't your deposition and you didn't join in the motion. Moreover, you had the opportunity to take his deposition and then you decided against it. I'll get back to you about whether we plan to videotape or not.

Jonathan W. Brown, Esq.
LIPSITZ GREEN SCIME CAMBRIA LLP
42 Delaware Avenue, Suite 120
Buffalo, New York 14202-3924

EXHIBIT B, PAGE 1

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From: Dan DeCarlo [mailto:DECARLO@lbbslaw.com]
Sent: Friday, October 09, 2009 2:34 PM
To: richard labowe; mark hoffman; Jonathan W. Brown; lou sirkin
Cc: Daniel Lewis; Mina Hamilton
Subject: Flynt v. Flynt- Depo of Jimmy Flynt Sr.

Gentlemen:

I understand from Lou that there are no other dates in October that meet with everyone's schedule. Therefore, we will participate on October 21. Because of scheduling issues, we are planning on attending by phone. In order to do so, we need to be provided with the documents that will be shown to Mr. Flynt well in advance of the deposition. We will provide you with copies of any documents we intend on showing Mr. Flynt as well in advance of the deposition.

Please advise if Mr. Flynt's deposition will be video taped.

I am still waiting for the stipulation and proposed order for Judge Matz.

Regards.

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